REMARKS

In this application, claims 1-48 are currently pending. Claims 1-11, 15-29, and

33-43 are rejected under 35 U.S.C. § 103(a) as unpatentable over the combination of

Understanding Universal Plug and Play (hereinafter "MS") and XML Schema Part 0:

Primer (hereinafter "W3C"). Dependent claims 12-14, 30-32, and 44-46 are rejected

under 35 U.S.C. § 103(a) as unpatentable over the combination of MS, W3C, and Dubal

et al. (hereinafter "Dubal"). Claims 47 and 48 have been added and depend on claims 1

and 33, respectively. Applicants submit that the pending claims are patentable because

the cited references, even when combined, do not teach or suggest every limitation of the

claims, and accordingly request reconsideration and withdrawal of the pending rejections.

Regarding claims 1 and 33, MS does not teach creating a device description page

that stores categories of information to be presented based on *user* input. The only device

description pages disclosed in MS are those that contain information created by the

vendor. For example, on page 17 paragraph 4 through page 18 paragraph 1, MS teaches,

> The UPnP Device Architecture defines a schema or template for creating device and service descriptions for any device or service type. Individual working committees subsequently standardize on various device and service types and create a template for each individual device or service type. Finally, a *vendor* fills in this template with information specific to the device or service, such as the device name, model number, manufacturer name and URL to the service description. (emphasis added).

As another example, page 27 of MS teaches, "The URL for the presentation page is

contained in the device description ... The capabilities of the presentation page are

completely specified by the UPnP vendor." (emphasis added). For additional examples,

please see MS page 13, paragraph 3 and page 26, paragraph 1. Therefore, it is the vendor

in MS that controls the type of information that can be presented. The user is not able to exercise this type of control, as claims 1 and 33 require.

Claims 1 and 33 further require "creating a device description page using a markup language" and "storing the categories of information in the device description page." MS does not and would not teach the creation of a device description page to store the categories of information specified by a user because, as explained above, the device description pages in MS are already created by the vendor. Thus, the user is restricted to the services defined by the vendor without the flexibility to specifically choose the categories of information to be presented. In contrast, the Applicants' invention allows for user customization of the types of information to be displayed at the information presentation appliance, which is clearly not contemplated by the MS reference.

The Office has only relied on the W3C reference to show that categories of information can be defined in XML schema. W3C is merely an introduction to XML. While W3C discusses XML schema using a purchase order schema as an example, there is no teaching in W3C of a user specifying categories of information to be presented in the context of an information presentation appliance. Without context for the usage of the language even remotely similar to the Applicants' claims, W3C certainly cannot teach receiving user input specifying categories of information to be presented. Therefore, W3C also fails to teach all the elements of these claims either alone or in combination with MS. Since the MS and W3C combination fails to teach all of the elements of claims 1 and 33, as required by the MPEP, claims 1 and 33 are patentable over MS and W3C for at least these reasons.

Regarding claim 15, as explained above with respect to claims 1 and 33, there is no "processing unit for performing steps comprising: creating a device description page written in a markup language and containing categories of information specified by a user through the user input device," because all of the device description pages in MS are created by the vendor. Furthermore, claim 15 has been amended to clarify that the user input device is "for enabling a user to specify categories of information to be presented." Neither MS nor W3C teach an information presentation appliance with this input device where categories of information are inputted by a user through the user input device and stored within the appliance. The Office contends that a user input device is "implied" in MS because MS generally teaches the ability to control. The control discussed in MS, however, is limited to vendor specified services such as playing a disc in a DVD player (see pg. 28). Taking this DVD player as an example, although there may be a user input device such as a play button on the DVD player itself, this is not analogous to the user input device in claim 15 because it does not enable "a user to specify categories of information to be presented" as explicitly required by the claim. MS does not contemplate this type of information filtering by a user at the information presentation appliance. Since neither MS nor W3C teach all of the elements of claim 15, this claim is patentable over this combination of references.

Similar to claim 15, the MS and W3C combination does not teach "a user input device for performing steps comprising: receiving user input specifying selected categories of information" as required by claim 23. This claim also contains the additional element, "a processing unit for performing steps comprising: parsing the device description page to identify available categories of information; and invoking a deliver

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function referenced by a service description page to receive an element of information belonging to the selected categories of information." The MS and W3C combination fails to teach this advanced functionality within the information presentation device itself. As taught in MS, only a device such as a personal computer is capable of parsing a device description page and invoking a deliver function, not an information presentation appliance. Therefore, claim 23 is patentable over the MS and W3C combination.
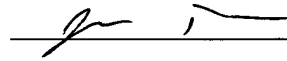
Claims 7 and 39 have been amended to clarify that the receiving user input in these claims occurs "at the information presentation appliance." As explained with regard to claims 15 and 23, nowhere in the MS and W3C combination is this type of user input received at the information presentation appliance. Therefore, claims 7 and 39 as amended are clearly patentable over MS and W3C and, thus, it is respectfully requested that these rejections be withdrawn.

In re Appln. of Milton et al.
Application No. 10/037,242

Conclusion

The application is considered in good and proper form for allowance, and the

Examiner is respectfully requested to pass this application to issue. If, in the opinion of the

Examiner, a telephone conference would expedite the prosecution of the subject application,

the Examiner is invited to call the undersigned agent.

Respectfully submitted,

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